

REMARKS

Favorable consideration of this application is respectfully requested.

Claims 1-30 are currently active in this case.

In the outstanding Official Action, Claims 1, 2, 4, 7, 15, 16, 18, 21, 29 and 30 were rejected as being unpatentable under 35 U.S.C. §102(e) over *Chang et al.* (U.S. Pat No. 6,272,664, hereinafter *Chang*).

Applicant appreciatively acknowledges the allowance of Claims 8-14 and 22-28 , and the allowability of Claims 3, 5, 6, 17, 19, and 20.

Applicant appreciatively acknowledges the informal communication between Applicant's attorney and Examiner Ferris on Wednesday May 15th. It was agreed that this amendment would be submitted and that an After Final interview would be subsequently conducted. The Examiner agreed to accept a supplemental amendment if the any changes to the amendment were needed in light of the interview.

Applicant respectfully traverses the assertion in the outstanding office action that *Chang's* abstract and/or *Chang's* summary teaches Applicant's claimed invention. Applicant respectfully notes the first line of *Chang's* abstract and summary which state: "*A system and method for using scalable polynomials to translate a look-up table delay model into a memory efficient model.*" Note also abstract line 10, which describes *Chang* selecting a polynomial that represents the timing functions of the look-up table. Thus, *Chang* takes a model and translates it into an efficient model, but the model still performs the same or nearly identical function as the original look-up table.

In contrast, Applicant's claimed invention transforms a candidate cell into a requested cell. The transformation from a candidate cell changes its function to that of the requested cell, and is entirely different than merely translating a cell to be more efficient.

Claim 1 (and corresponding Claim 15) specifically recite:

"e) transforming the candidate cell into the requested cell by performing each rule corresponding to the returned value."

However, *Chang* fails to teach or suggest similar subject matter.

Applicant respectfully notes that other significant differences between the claimed invention and *Chang* include:

In *Chang*, the end product is the same cell translated into a mathematical formula. In contrast, in the claimed invention, both the candidate cell and the requested cell are already represented by mathematical formulas, and the end product is a transformation of the candidate cell into the requested cell.

In the Claimed invention, the original mathematical representations of both the candidate cell and the requested cell are utilized in an operation that returns a value. No such operation is performed by *Chang*.

In the claimed invention, the value returned from the operation is used to identify (corresponds to) at least one rule used to perform the transformation of the candidate cell into the requested cell. *Chang's*

disclosure does not even mention a rule based system, let alone the claimed transformation.

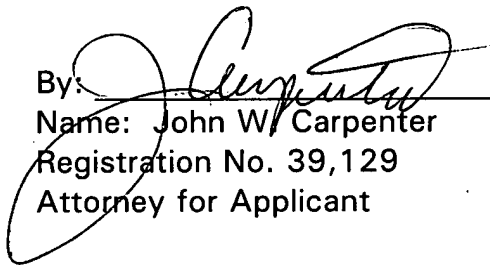
In sum, Applicant respectfully notes that *Chang* is entirely different from the claimed invention and respectfully submits that it is inappropriate in a 102 rejection which requires each claimed limitation must be met. In fact, other than equating *Chang's* mathematical model (*Chang's* end product) to Applicant's claimed mathematical representation of a cell (Claim 1's starting point), Applicant is unable to find any substantive limitations of the claimed invention that are met by *Chang*. Since functionally equivalent claim limitations are present in each of independent Claims 1 and 15, Applicant respectfully submits that each pending Claim is fully patentable over *Chang*.

Consequently, no further issues are believed to be outstanding, and it is respectfully submitted that this case is in condition for allowance. An early and favorable action is respectfully requested.

Respectfully submitted,

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